

1 QUIN DENVIR, Bar No. 49374
Federal Defender
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4 Attorney for Defendant
ROSALVA BERNAL

5 **OK/HAV**

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7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11
12 UNITED STATES OF AMERICA,) CR S-05-00145 DFL
13 Plaintiff,)
14 v.) **STIPULATION AND [PROPOSED]**
15 ROSALVA BERNAL, et al.,) **ORDER**
16 Defendants.)
17 _____)

18 Plaintiff United States of America, by its counsel,
19 Assistant United States Attorney Jason Hitt, and defendant Rosalva
20 Bernal, by her counsel, Federal Defender Quin Denvir, hereby stipulate
21 and agree that the hearing on the motion to suppress and status
22 conference currently calendared for August 25, 2005 should be
23 continued as to defendant Rosalva Bernal and the matter set for change
24 of plea on Friday, September 2, 2005 at 10:00 a.m.

25 The parties are in the process of finalizing a plea
26 agreement and require additional time in which to complete the process
27 and have the agreement reviewed by the defendant. The parties agree
28

1 that time should continue to be excluded due to the pending motion to
2 suppress.

3 Respectfully submitted,

4 MCGREGOR SCOTT
5 United States Attorney

6 DATED: August 24, 2005

7 /s/ Quin Denvir
8 Telephonically authorized to sign
9 for JASON HITT
10 Assistant U. S. Attorney

11 Attorney for Plaintiff

12 DATED: August 24, 2005

13 /s/ Quin Denvir
14 QUIN DENVIR
15 Federal Defender

16 Attorney for Defendant Bernal

17 **O R D E R**

18 FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

19
20 DATED: August 25, 2005

21
22 
23 _____
24 DAVID F. LEVI
25 United States District Judge
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27
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